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45 **IN THE UNITED STATES DISTRICT COURT**

46 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

47 **SAN JOSE DIVISION**

48 JOHN STOSSEL, an individual,

49 Plaintiff,

50 v.
51 META PLATFORMS, INC., a Delaware
52 corporation; SCIENCE FEEDBACK, a French
53 non-profit organization; and CLIMATE
54 FEEDBACK, a French non-profit organization,

55 Defendants.

56 Case Number: 5:21-cv-07385-VKD

57 **DECLARATION IN SUPPORT OF
58 STIPULATION TO CONTINUE
59 INITIAL CASE MANAGEMENT
60 CONFERENCE (LR 6-2(A))**

1 I, Krista L. Baughman, declare and state as follows:

2 1. I am a partner at Dhillon Law Group Inc. and counsel for Plaintiff John Stossel
3 (“Plaintiff”). I am an attorney in good standing duly admitted to practice before all Courts of the
4 State of California. I am admitted to practice law in the states of New York and California, and
5 admitted before all state and federal courts in the state of California, and the United States Court
6 of Appeals for the Eleventh Circuit. Except as to those matters stated on information and belief, I
7 have personal knowledge of the matters set forth herein and if called as a witness could and
8 would competently testify thereto. As to those matters stated on information and belief, I believe
9 them to be true.

10 2. Plaintiff filed the Complaint in the instant matter on September 22, 2021 (ECF No.
11 1.)

12 3. Defendant Meta Platforms, Inc. (“Meta”) moved to dismiss Plaintiff’s Complaint
13 pursuant to Federal Rules of Civil Procedure Rule 12(b)(6) and to strike Plaintiff’s asserted claims
14 against Meta pursuant to California’s anti-SLAPP statute on November 29, 2021 (“Meta Motion”)
15 (ECF No. 27.)

16 4. Defendant Science Feedback (“Science Feedback”) moved to dismiss Plaintiff’s
17 Complaint pursuant to Federal Rules of Civil Procedure Rule 12(b)(6) and to strike Plaintiff’s
18 asserted claims against Science Feedback pursuant to California’s anti-SLAPP statute on January
19 31, 2022 (“Science Feedback Motion”) (ECF No. 50.)

20 5. This Court held hearings on both Meta’s Motion and Science Feedback’s Motion
21 on April 12, 2022 (ECF No. 58.)

22 6. The Court has ordered that discovery in this case is stayed as to all the Parties until
23 the Court issues an order deciding both Meta’s Motion and Science Feedback’s Motion (ECF No.
24 48.)

25 7. The Court originally set the initial Case Management Conference in this matter on
26 June 14, 2022 (ECF No. 53).

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8. The Court previously ordered a continuance of the June 14, 2022 initial Case Management Conference until July 19, 2022 at 1:30 p.m., pursuant to stipulation between the parties (ECF No. 60.)

9. Lead trial counsel for Plaintiff and Science Feedback are each unavailable on July 19, 2022, due to previously scheduled engagements. Between May 20, and May 22, 2022, my office met and conferred with Meta’s and Science Feedback’s respective counsel with regard to a stipulation between the parties to request that the Court vacate the July 19, 2022 initial Case Management Conference (“CMC”) and continue the CMC to a later date.

10. After meeting and conferring, the Parties agree that due to counsel's scheduling conflicts, good cause exists to continue the initial CMC until the Court's next available date, which the Parties understand to be August 2, 2022.

11. Further, continuing the initial Case Management Conference from July 19, 2022, until August 2, 2022 will not affect any other date already set by Court order.

12. There have previously been four stipulations and orders to enlarge time filed in this matter: (1) stipulation and order to allow Meta additional time to file its response to the Complaint (ECF No. 18); (2) stipulation and order to extend time for Plaintiff to file his Opposition to Meta’s response to the complaint and to extend Meta’s reply deadline (ECF Nos. 19–20); (3) stipulation and to stay discovery and continue the deadline for initial disclosure until the Court’s order deciding Meta’s motion (ECF Nos. 25–26); and (4) stipulation and order to continue the hearing date on Meta’s Motion to Dismiss the Complaint and Special Motion to Strike under California’s Anti-SLAPP Statute (ECF No. 27.)

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on May 25, 2022.

/s/ Krista L. Baughman
Krista L. Baughman